

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

JOHN TURNER	:	CIVIL ACTION
AND		
NANNETTE TURNER	:	
vs.	:	
	:	
B.V. SHIPPING COMPANY	:	
LUZON STRAIT (GRONINGEN)	:	NO. 04-0936-JJF

**PLAINTIFFS' PROPOSED SPECIAL VERDICT FORM**

Plaintiffs John and Nannette Turner request the Court to propound the following special Verdict.

1. Was defendant B.V. Shipping Company Luzon Strait (Groningen), the owner of the M/V "Luzon Strait, negligent?

YES: \_\_\_\_\_

NO: \_\_\_\_\_

(If your answer to Question #1 is YES, proceed to Question #2. If your answer is NO, return to the courtroom)

2. If so, was such negligence a legal cause of any injury and damages to the plaintiff John Turner?

YES: \_\_\_\_\_

NO: \_\_\_\_\_

(If your answer to Question #2 is YES, proceed to Question #3. If your answer to Question #2 is NO, return to the courtroom)

3. Was plaintiff John Turner guilty of some contributory negligence?

YES: \_\_\_\_\_

NO: \_\_\_\_\_

(If your answer to Question #3 is "NO", do not answer Question #4 and go to Question #5. If your answer to Question #3 is "YES" then answer Question #4.)

4. What part, if any, stated as a percentage, did plaintiff John Turner's own negligence play in causing his injury?

\_\_\_\_\_ %

5. What amount do you find, without any reduction for any negligence that you may find on plaintiff John Turner's part, will fairly and adequately compensate plaintiff John Turner for his injuries?

\$ \_\_\_\_\_

6. What amount do you find, without any reduction for negligence that you may find on plaintiff John Turner's part, will fairly and adequately compensate plaintiff Nannette Turner for the loss of society of her husband John Turner?

\$ \_\_\_\_\_

Respectfully Submitted,

/S/ Stephen B. Potter  
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